

Presentment/Hearing Date: August 14, 2018 at 10:00 A.M.
Objection Deadline: August 1, 2018 at 5:00 P.M.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

LEHMAN BROTHERS HOLDINGS INC., et al.

Chapter 11
Case No. 08-13555 (SCC)

Debtors.

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**NOTICE OF PRESENTMENT OF PROPOSED ORDER PURSUANT
TO FEDERAL RULES OF BANKRUPTCY PROCEDURE 2004 DIRECTING
EXAMINATION AND PRODUCTION OF CERTAIN DOCUMENTS**

PLEASE TAKE NOTICE that Fondo de Proteccion Social de los Depositos Bancarios, f/k/a Fondo de Proteccion Social de los Depositos Bancarios y Proteccion Bancaria (“FOGADE”), by and through its attorneys, White & Wolnerman, PLLC, will seek entry of an order (the “Proposed Order”) pursuant to Federal Rule of Bankruptcy Procedure 2004 (“Rule 2004”): (i) authorizing FOGADE, by its counsel, to issue subpoenas upon the Debtors, Epiq Systems (“Epiq”), and the plan administrator (the “Plan Administrator”) authorizing and directing the production of documents, as more fully identified on Exhibit “A” annexed to the attached *Application for an Order Pursuant to Federal Rule of Bankruptcy Procedure 2004 Directing Examination and Production of Certain Documents*, and further directing the oral examination of a representative of the Debtors, Epiq, and the Plan Administrator; (ii) authorizing the issuance of third party subpoenas, including subpoenas directed to Lehman Brothers Treasury Co. BV, Euroclear Brussels, Clearstream and Smith Rocke, Ltd. related to distributions made on account of the structured notes which are the basis for FOGADE’s allowed distributions; and (iii) allowing, as may be necessary, for the submission of commissions to

allow for the discovery outside of this District and overseas, by presenting the Proposed Order to the Honorable Shelley C. Chapman, United States Bankruptcy Judge, One Bowling Green, New York, NY 10004, on August 14, 2018 at 10:00 a.m.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Application shall be in writing, shall be served upon the undersigned attorneys for FOGADE with a courtesy copy to Chambers, so as to be received by August 1, 2018 at 5:00 p.m.; and shall be filed with the Bankruptcy Court together with proof of service.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed a hearing to consider the relief requested in the Application will be held on August 14, 2018 at 10:00 a.m. before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, One Bowling Green, New York, NY 10004.

PLEASE TAKE FURTHER NOTICE that the Order may be entered without a hearing unless a timely objection is made.

PLEASE TAKE FURTHER NOTICE that replies to any objections shall be filed no later than August 10, 2018.

Dated: New York, New York
July 2, 2018

WHITE & WOLNERMAN, PLLC

By: /s/ Randolph E. White
Randolph E. White
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New York, New York 10022
Counsel to FOGADE